

Appendix C

City of Atlanta Ethics Office Work Plan 2005 - 2007

The Ethics Officer, in conjunction with the City of Atlanta's Board of Ethics, proposes a work plan for the next two years to faithfully execute the duties of the office as established by the City Code, create a "culture of ethics" in the City, and to assure that the City enjoys the full credit and trust of its citizens as a government that truly conducts itself in an ethical manner.

Administrative

Establish a Public Integrity Unit in conjunction with the City's Office of Internal Auditor to provide for closer collaboration and sharing of resources between the offices to more efficiently and effectively educate, advise, interpret, audit, investigate, and enforce the Standards of Conduct in the City's Code of Ordinances.

Add additional staff in order to become more effective in promoting and enforcing ethical standards for city officials and employees by:

- abolishing the position of Administrative Assistant, Sr., and creating the position of Administrative Analyst, Sr., which will have the responsibility of managing the Ethics Office, maintaining databases, analyzing data, managing the eFiling system, and coordinating the IntegrityLine
- hiring a forensic investigator to investigate allegations of ethical violations, financial misconduct, and fraud received through the IntegrityLine and Ethics Office (position to be shared with Internal Auditor's office)
- establishing a pay grade for the Ethics Officer that is commensurate with other city employees with comparable authority and responsibilities

Develop a strong committee structure for the Board of Ethics to better use the talents and resources of every Board member to support the work of the Ethics Office to further the purpose of the Code of Ethics; and give appropriate recognition for the work of departing and former board members.

Public Education

Develop and distribute public educational materials on the Code of Ethics that address specific populations and issues, including:

- new employees
- neighborhood planning unit officers
- former employees and officials
- contractors, vendors, and companies doing business with the City
- citizen groups
- exceptions to the ban on gratuities

Establish policies and procedures to notify new employees in writing about the City's ethical standards and financial disclosure requirements; obtain written acknowledgement that new employees have received a copy of the standards and training on them; and identify a process for notifying employees who leave about the one-year post-employment rule.

Assist with the development of the proposed City of Atlanta Code of Conduct by reviewing sections of the proposed Code and developing examples related to conflicts of interest, gratuities, doing business with the City, outside employment, use of city property, the IntegrityLine, and whistleblower protection.

Write annually to city board members, hearing officers, and NPU officers about the City's ethical standards, relevant Board opinions, online forms and how they apply to board members as city officials.

Produce and distribute a bi-monthly ethics e-newsletter for announcing Board decisions, addressing commonly asked questions, and discussing everyday ethical dilemmas.

Maintain and upgrade the Board of Ethics website by:

- updating the content of the website on a monthly basis
- adding new sections, such as an annotated Code of Ethics, an "Everyday Ethics" column, and online training modules
- improving the capacity to search online city financial disclosure statements and reports
- producing reports containing analyses of information disclosed on city ethics forms

Training

Develop training programs designed specifically for board members, NPU officers, and online training of employees; annually update hypothetical scenarios presented for discussion in "*Don't Get Conflicted Out*" during New Employee Orientation; develop an ethics training program on gratuities, conflicts of interest, and disclosure for upper level managers and supervisors; and plan an "*Ethics in the Movies*" training program using film clips that raise ethical questions for public employees and elected officials.

Present training workshops for supervisors and inspectors in city departments who have not previously scheduled sessions, targeting Aviation, Finance, Planning, Procurement, and Public Works; initiate regularly scheduled training programs to be held at different city work sites for all city officials and employees who are required to file annual financial disclosure statements; host an annual ethics workshop for new board members and NPU officers; and prepare a presentation for citizens' groups.

Seek the adoption of a city policy and practice requiring mandatory ethics training every three years for the 1,200 officials and employees who are required under the Code of Ethics to disclose conflicts of interest and financial interests.

Rendering Advice

Respond to requests for advice in a timely, consistent, understandable, and persuasive manner; monitor data to identify (a) recurring questions as possible topics for advisory opinions and (b) well-settled issues as appropriate topics for “frequently asked questions”; and evaluate and report to the Board at least once a year on informal advisory letters and other written advice that the Ethics Officer gives to employees and officials.

Identify appropriate topics for the Board to resolve in formal advisory opinions and draft formal advisory opinions addressing the following code provisions:

- one-year post-employment rule
- representing private interests before city agencies
- solicitations on behalf of city programs
- use of confidential information
- exceptions to the ban on gratuities for food, travel, gifts to the City, and hosting expenses
- board members’ doing business with the City
- definitions of “prohibited sources” and city “employees”
- filing of gift, expense reimbursement, and conflicts of interest disclosure forms

Investigations and Enforcement Actions

Establish the IntegrityLine as a responsive and effective ethics hotline by:

- collaborating with the City Internal Auditor and the Compliance Manager to establish a coordinated, citywide hotline for receiving anonymous tips and complaints about ethical violations, fraud, and employee misconduct
- contracting with a third-party hotline provider to establish a call center, web-based reporting system, and case management system
- developing internal city policies and procedures for assigning calls, tracking investigations, resolving complaints, and reporting on actions taken

Promote the IntegrityLine through a well-coordinated public education campaign that launches the hotline and advertises its purpose to employees and the general public using a variety of media; and develop ways to repeat the publicity about the IntegrityLine at least once a year.

Improve ethics investigations by:

- hiring an employee to investigate calls received through the IntegrityLine
- developing better relationships with local, state, and federal law enforcement agencies, inspector generals, and ethics offices
- initiating enforcement actions, as needed, against city employees and officials for violations of the city's ethical standards

Review and analyze data generated by calls received by the Ethics Office and the IntegrityLine to identify patterns of misconduct; collaborate with the City Internal Auditor on a performance audit of one department to review policies and practices related to conflicts of interest and other ethical issues; and conduct a performance audit on outside employment by city employees in a second department.

Legislation and Lobbying

Establish a system for identifying lobbyists at City Hall; ensure they have registered with the State Ethics Commission as lobbyists at the local level; and define and consider problems with the current version of the City's Standards of Conduct that may require legislative changes in the future.

Disclosure Statements and Reports

Improve the ethics disclosure system through:

- working with departments and boards to develop accurate lists of persons required to file annual financial disclosure statements
- posting online the names of employees and boards required to file financial disclosure statements each year
- establishing an electronic means of identifying employees required to file financial disclosure statements, as part of the new software for city personnel
- revising financial disclosure forms to clarify questions
- establishing policies on filing of disclosure reports related to gifts, expense reimbursements, and disclosure of conflicts of interest

Mandate online filing of all city disclosure forms by all city elected officials and employees, beginning in 2006, and by all other filers in 2007; improve the public search function of the efilings system to allow the general public to easily review and analyze all information disclosed on the forms; and plan for a system that permits revision of questions contained in the online forms as needed.

Establish an audit process for reviewing all city disclosure statements to ensure the accuracy and completeness of the information disclosed; and write an annual report on financial disclosure statements and other city disclosure reports.

Prepare and issue an annual report on the "State of Ethics in the City of Atlanta" to present to the Mayor, Atlanta City Council, and Atlanta citizens.